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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IN RE	§	
	§	
ARUBA PETROLEUM, INC	§	CASE 16-42121
	§	
DEBTOR	§	

DEBTOR'S MOTION TO EXTEND EXCLUSIVITY

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 660 N. CENTRAL EXPRESSWAY, THIRD FLOOR, PLANO, TEXAS 75074, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.

IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.

TO THE HONORABLE BRENDA T. RHOADES U.S. BANKRUPTCY JUDGE:

Aruba Petroleum, Inc. ("Debtor") as debtor in possession, files this its Motion to Extend Exclusivity (the "Motion") and in support thereof would respectfully show the court as follows:

I. JURISDICTION AND PROCEDURAL BACKGROUND

1. Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy

Code on November 22, 2016. Debtor continues to operate its business and manager its business

and property as a debtor-in-possession pursuant to the provisions of section 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Bankruptcy Case and no committee has yet been appointed or designated by the Office of Unites States Trustee.

- 2. This court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C.§ 157(b). Venue of this case and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.
 - 3. This Motion requests relief pursuant to section 1121 of the Bankruptcy Code.

II. STATEMENT OF FACTS

- 4. Debtor is an operator of approximately 250 oil & gas wells in Texas.
- 5. In connection with its operations, the Debtor has used numerous interest holders in the various wells. As a result the debtor has over 4,000 creditors or parties in interest.
- 6. The Debtor is in the process of selling a number of its assets to generate funds for a plan of reorganization.
- 7. Pursuant to 11 U.S.C. §1121 the Debtor is allowed an exclusive period of 120 days to file its Plan of Reorganization.
 - 8. The deadline for the Debtor's exclusive right to file a plan is March 22, 2017.
 - 9. Pursuant to 11 U.S.C. §1121 the Debtor may seek additional time to file a plan.
- 10. The Debtor seeks an extension of the exclusivity time from March 22, 2017 until May 22, 2017 to file its Plan. Furthermore, the Debtor seeks and extension of time to obtain confirmation of its Plan from May 22, 2017 until July 22, 2017.
- 11. The Debtor would show the extension is necessary as the Debtor has recently filed a motion to sell a large portion of its current assets and to the extent the sale is granted the

Debtor can use the proceeds to fund its Plan. To the extent the sale is not granted the Debtor will need additional time to determine the best repayment plan for the creditors.

III. RELIEF REQUESTED

12. Pursuant to 11 U.S.C. 1121 (d) the Debtor seeks an extension of the exclusive time for the Debtor to file a plan and to obtain confirmation.

WHEREFORE, PREMISES CONSIDERED Debtor requests the Court to enter an order (i) extending the exclusivity from March 22, 2017 to May 22, 2017 and extending the time to confirm a Plan from May 22, 2017 to July 22, 2017, and such other and further relief to which Debtor may show itself to the justly and equitably entitled or which the Court may deem just and proper.

Respectfully Submitted,

/s/ Eric Liepins
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was sent via first class and/or electronic mail to the following parties and those on the attached service list on the 6th day of March 2017.

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/s/ Eric Liepins ____ Eric Liepins